

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

LASHEENA SIPP-LIPSCOMB AND	: CIVIL ACTION NO. 20-cv--01926
ANDRES GARDIN, SR., Individually and in	:
their own right and as Parents and Natural	:
Guardians of ANDRES GARDIN, JR., a minor	:
	:
V.	:
	:
EINSTEIN PHYSICIANS PENNYPACK	:
PEDIATRICS, et al	:
	:

**PROPOSED VERDICT SHEET OF DEFENDANTS,
CHARLES W. CONCODORA, M.D. AND UROLOGY FOR CHILDREN**

See attached. Defendants, Charles W. Concodora, M.D. and Urology for Children reserve the right to amend and/or supplement this proposed Verdict Sheet based on the evidence admitted at trial and any rulings by the Court.

GERMAN, GALLAGHER & MURTAGH

Date: January 16, 2023

BY: /s/ John P. Shusted

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Urology for Children

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VERDICT SHEET

1. Do you find that Arjun Kalyanpur, M.D. deviated from the accepted standard of care in connection with his care of AG Jr.?

Yes _____ No _____

If you answered “No” to Question 1 go to Question 3. If you answered “Yes” to Question 1 go to Question 2.

2. Do you find that the conduct of Arjun Kalyanpur, M.D. was a factual cause of AG Jr.’s injury?

Yes _____ No _____

Go to Question 3.

3. Do you find that Einstein Pennypack Pediatrics deviated from the accepted standard of care in connection with its care of AG Jr.?

Yes _____ No _____

If you answered “No” to Question 3 go to Question 5. If you answered “Yes” to Question 3 go to Question 4.

4. Do you find that the conduct of Einstein Pennypack Pediatrics was a factual cause of AG Jr.'s injury?

Yes _____ No _____

Go to Question 5.

5. Do you find that St. Christopher's Hospital for Children deviated from the accepted standard of care in connection with its care of AG Jr.?

Yes _____ No _____

If you answered "No" to Question 5 go to Question 7. If you answered "Yes" to Question 5 go to Question 6.

6. Do you find that the conduct of St. Christopher's Hospital for Children was a factual cause of AG Jr.'s injury?

Yes _____ No _____

Go to Question 7.

7. Do you find that Hayley Bartkus deviated from the accepted standard of care in connection with her care of AG Jr.?

Yes _____ No _____

If you answered "No" to Question 7 go to Question 9. If you answered "Yes" to Question 7 go to Question 8.

8. Do you find that the conduct of Hayley Bartkus was a factual cause of AG Jr.'s injury?

Yes _____ No _____

Go to Question 9.

9. Do you find that Pramath Nath, M.D. deviated from the accepted standard of care in connection with his care of AG Jr.?

Yes _____ No _____

If you answered “No” to Question 9 go to Question 11. If you answered “Yes” to Question 9 go to Question 10.

10. Do you find that the conduct of Pramath Nath, M.D. was a factual cause of AG Jr.’s injury?

Yes _____ No _____

Go to Question 11.

11. Do you find that Erin Hassel, M.D. deviated from the accepted standard of care in connection with her care of AG Jr.?

Yes _____ No _____

If you answered “No” to Question 11 go to Question 13. If you answered “Yes” to Question 11 go to Question 12.

12. Do you find that the conduct of Erin Hassel, M.D. was a factual cause of AG Jr.’s injury?

Yes _____ No _____

Go to Question 13.

13. Do you find that Charles Concodora, M.D. deviated from the accepted standard of care in connection with his care of AG Jr.?

Yes _____ No _____

If you answered “No” to Question 13 go to Question 15. If you answered “Yes” to Question 13 go to Question 14.

14. Do you find that the conduct of Charles Concodora, M.D. was a factual cause of AG Jr.’s injury?

Yes _____ No _____

Go to Question 15.

15. Do you find that Eric Cho, M.D. deviated from the accepted standard of care in connection with his care of AG Jr.?

Yes _____ No _____

If you answered “No” to Question 15 go to Question 17. If you answered “Yes” to Question 15 go to Question 16.

16. Do you find that the conduct of Eric Cho, M.D. was a factual cause of AG Jr.’s injury?

Yes _____ No _____

If you answered “Yes” to Questions 2, 4, 6, 8, 10, 12, 14 and/or 16, go to Question 17.

If you answered “No” to Questions 2, 4, 6, 8, 10, 12, 14 and 16, you may cease deliberations and return to the Courtroom.

17. Please assign the percentage of liability attributable to each party listed.

Arjun Kalyanpur, M.D. _____

Einstein Pennypack Pediatrics _____

St. Christopher’s Hospital for Children _____

Hayley Bartkus _____

Pramath Nath, M.D. _____

Erin Hassel, M.D. _____

Charles Concodora, M.D. _____

Eric Cho, M.D. _____

TOTAL: % 100

Please review your response to ensure that your response is consistent with your response to Questions 1-16. Please review your response to ensure that the total percentage assigned to each individual adds up to one hundred percent (100%), or provide further explanation below.

Go to Question 18.

18. Please state the damages.

\$ _____

Foreperson

----- **End of Verdict Sheet** -----

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 16, 2023, a true and correct copy of Defendants, Charles W. Concodora, M.D. and Urology for Children's, Proposed Verdict Sheet was filed with the Court and served upon counsel of record via the Court's ECF System.

GERMAN, GALLAGHER & MURTAGH

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